

ERIOUS JOHNSON, JR. OSB #130574
E-mail: eriousjohnson.HJLLC@gmail.com
HARMON JOHNSON LLC
1415 Commercial St. SE
Salem, OR 97302
Phone: (503) 991-8545
Fax: (503) 622-8545

Of Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

REGINIA GRIDER,

Civil Case No. 6:20-cv-01176-MC

Plaintiff,

v.

OREGON STATE UNIVERSITY,

**MOTION TO WITHDRAW AS
COUNSEL OF RECORD FOR
PLAINTIFF**

Defendants

1. Pursuant to LR 83-11, Erious Johnson, Jr., counsel for Plaintiff, Reginia Grider, seeks leave of court to withdraw as Counsel of Record for Plaintiff.

2. On March 9, 2021, Plaintiff terminated my representation of her by email, specifically stating:

Erious,

Writing to inform you that I cannot go to court against Oregon state with you as my counsel. If I recall correctly, the last time I was deposed, I was prepped and my attorney was present. Your lack of accountability for failing to inform me that this deposition was scheduled is also disconcerting. Asking whether I am available does

not equate to a confirmation that an appointment is scheduled or to me picking the date. It was your responsibility to track that I had not accepted any meeting invites that you might have sent. I close all email with my current contact information, yet you tried to reach me via a number that has not been associated with me since September 2020. I sent you documentation that I was living in a homeless shelter yet you are asking me what's going on. How can you expect me to engage under these circumstances? I am your client.

Regards,

Reginia

3. This matter was joined on October 9, 2020, with the filing of Defendant's Answer to Plaintiff's Amended Complaint.

4. Initial Disclosures pursuant to LR 26-7 have been exchanged.

5. Plaintiff and Defendant have exchanged, and responded, to each other's First Requests for the Production of Documents, Admissions and Answers to Interrogatories.

6. Discovery was to cut-off on April 2, 2021.

7. There has been no deadline extension thus far in this matter.

8. Given the early stage of this litigation and the extensive discovery already had, Plaintiff may be granted an extension to seek and retain substitute counsel without prejudicing her cause of action.

9. Given Plaintiff's termination of my representation and present posture of this litigation, I ask leave of Court to withdraw as Plaintiff's Counsel of Record.

////

////

////

////

10. Plaintiff's current address for Notices is:

Reginia Grider
17307 NE Couch Street
Portland Oregon 97230

DATED this 12th day of March, 2021.

HARMON JOHNSON LLC



Erious Johnson, Jr., OSB #130574

E-mail: ejohnson.HJLLC@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document titled **MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR PLAINTIFF** on the following named person(s) on the date indicated below by:

- | | |
|---|--|
| <input type="checkbox"/> mailing with postage prepaid | <input checked="" type="checkbox"/> Electronic service pursuant to LR 100.13 |
| <input type="checkbox"/> hand delivery | <input type="checkbox"/> email pursuant to agreement among parties/counsel dated _____, consenting to service via email. |
| <input type="checkbox"/> facsimile transmission | <input type="checkbox"/> email, for which a confirmation of receipt of the email and the attachment by the following named person(s) has been received by the undersigned via the method of _____. |
| <input type="checkbox"/> overnight delivery | <input type="checkbox"/> eService via Odyssey File & Serve. |

If by mail or overnight delivery, a true copy of the above referenced document(s) was served upon said person(s) or party(ies), contained in a sealed envelope or package, addressed to said person to said person(s) or party(ies) at their last-known address(es) indicated below.

Naomi Levelle Haslitt , OSB No. 075857 naomi.haslitt@millernash.com Cody J. Elliott , OSB No. 091027 cody.elliott@millernash.com MILLER NASH GRAHAM & DUNN LLP 3400 U.S. Bancorp Tower 111 S.W. Fifth Avenue Portland, Oregon 97204 Telephone: 503.224.5858 Facsimile: 503.224.0155	Reginia Grider Plaintiff rgridermba@hotmail.com 17307 NE Couch Street. Portland Oregon 97230
---	---

DATED: March 12, 2021

HARMON JOHNSON LLC

s/ Erious Johnson, Jr.

Erious Johnson, Jr., OSB #130574

E-mail: ejohnsonHJLLC@gmail.com